EXHIBIT 11

Karp, Joshua

From: Stockinger, Trevor
Sent: Wednesday, April 09, 2008 4:24 PM
To: 'Campbell, Matt'
Cc: Klein, Charles B.
Subject: Meet and Confer Follow-Up

Matt:

We have not heard from you following-up on our Monday call.

First, you were to provide detail regarding the date restrictions placed on Abbott's production. As you know, Abbott's current RFP responses state that Abbott is only providing documents "on or around December 2003." From prior conversations, we understood this to mean that Abbott was only producing documents from 2003 and the first two quarters of 2004. On our last call, you indicated this was not correct -- in fact, Abbott produced documents from 2002 to 2004. I assume you mean from January 1, 2002 to December 31, 2004. If that is not the case, please let me know. You also indicated that Abbott intended to supplement its production with documents from January 1, 2002 to present. Please provide us with specific date ranges cabining Abbott's current production and any supplemental productions. If Abbott is applying different date restrictions to different categories of documents, please provide this detail as well.

As I explained on the Monday call, certain responsive categories of documents plainly fall outside of date restrictions Abbott is currently using. Documents responsive to these categories cannot be restricted by date ranges as you propose. In particular, documents relating to Abbott's decision to demand that its competitors take licenses to the Norvir patents and the ensuing licensing negotiations with GSK and others likely occurred before 2002 and should be produced. *See* GSK's RFP Nos. 25-32 and similar RFP served in *Doe*. In addition, documents pertaining to a possible price increase on Norvir, to the possible removal or partial removal of Norvir from the market, to the impact of any of those strategies on Abbott or competing sellers of PIs, and to the forecasting of sales of Kaletra should not be restricted by date. *See* GSK RFP Nos. 17-20.

Second, we understand that Abbott's production is limited to documents collected from only the following custodians: Heather Mason, Jesus Leal, Jeff Devlin and John Leonard. Please confirm that we are correct in this understanding. If documents in fact were produced from the files of other custodians, please let us know who these custodians are. In addition, please let us know whether Abbott intends to make future productions of documents from custodians other than those listed. Once we are certain we understand the scope of Abbott's production, we'll let you know if we think it is sufficient or too narrow.

Third, we understand that Abbott's production comprises documents produced in state and federal investigations of Abbott's price increase of Norvir. Based on our current understanding, these would include documents produced to the Attorneys General of California, New York, Michigan and Illinois, as well as to the NIH. It appears however that Abbott's current production strips documents produced in investigations of their original Bates labeling. GSK therefore cannot determine which documents were produced in investigations and which documents were newly produced. Please identify by Bates range the documents produced in each and every investigation regarding Abbott's price increase.

Fourth, on the Monday call, I inquired whether Abbott has produced documents relating to costs concerning Kaletra and Norvir, including R&D costs. As you are aware GSK has requested production of all documents responsive to requests for production served in *In re Abbott Laboratories Norvir Antitrust Litigation*. *See* GSK RFP No. 3. In that litigation, the plaintiffs served several RFPs encompassing documents concerning costs relating to these products. Abbott's responses to these RFPs is ambiguous. For example, it appears that Abbott originally outright refused to produce documents relating to costs for Kaletra and Norvir. *See Doe* RFPs Set 1 Nos. 3 & 4. However, Abbott also agreed to produce documents responsive to other RFPs which would include documents relating to Abbott's cost structure for these products. *See Doe* RFPs Set 1 Nos. 9 & 52; Set. 8 Nos. 2 & 3. Please clarify Abbott's position and confirm that Abbott is producing all responsive documents relating to its cost structure for Kaletra and Norvir. In addition, please confirm that Abbott is not restricting production of responsive financial information relating to Kaletra and Norvir based on the limited custodians from whom it appears to have collected documents.

Fifth, during the call we discussed Abbott's claim that it is too burdensome for Abbott to produce communications with the FDA or internal documents relating to communications with the FDA. Yet, in the *In re Abbott Laboratories Norvir Litigation*, it appears that Abbott agreed to produce these very documents. *See Doe* RFP Set No. 1 No. 49 ("Any and all documents or communications that refer or relate to Warning Letters or *other correspondence with the FDA regarding*

Norvir....") Please explain Abbott's inconsistent position.

Please respond before the end of this week.

Thank you,

Trevor